



07 January 2015

Local Plan Team
Chichester District Council
East Pallant House
Chichester
West Sussex
PO19 1TY

Dear Sir / Madam,

HRA Letter of Modifications to the Chichester Pre-submission Local Plan December 2014

The Chichester Local Plan: Key Policies Pre-submission 2014-2029 was subjected to full HRA in May 2014. Since that time a series of further modifications (December 2014) to the plan have been proposed. These are identified with the Further Proposed Modifications documents.

It is necessary for the proposed changes within the Further Proposed Modifications documents to be subjected to HRA analysis in order to determine whether they would alter any of the conclusions previously reached regarding the HRA of the Chichester Local Plan: Key Policies Pre-submission 2014-2029 in May 2014, or introduce any new impacts/effects. Changes that are solely concerned with clarifying wording in diagrams or supporting text in the Plan and within pre-ambles are not discussed below (with the exception of Table 7.2 in the pre-ambles of Policy 4 detailed below) as these would not present any mechanism for the Local Plan: Key Policies Pre-submission to affect European sites. Only amendments to Policy text have been assessed.

The analysis focusses on 'substantive' changes which in the context of HRA mean 'main' modifications proposed to policies (and Table 7.2 in Policy 4). The analysis of these proposed modifications is presented in Table 1. As with the schedule of proposed modifications itself, this analysis is not intended as a stand-alone document but should be read in conjunction with the HRA of the submitted Local Plan. As such, this document does not seek to comprehensively recap all the issues and analyses that were covered in the May 2014 HRA document but specifically seeks to identify any issues with the Further Proposed Modifications documents.

The most recent amendments are largely for clarity and clarification and to ensure consistency within the Local Plan and with Government policies. There are however amendments to the numbers of housing required within Chichester District. The increase in number of dwellings required within the Plan (see Table 1, Policy 4) has increased from 6973 to 7388 (an increase of 415 new dwellings required) over the Plan period 2012-2029. The allocation of the dwellings are discussed in Policies 5, 15 and 24 (see amendments highlighted in Table 1).

As discussed in the May 2014 HRA, an increase in dwellings within the city has potential to lead to a likely significant effect upon Chichester and Langstone Harbours SPA and Ramsar sites, Solent Maritime SAC, and Pagham Harbour SPA and Ramsar site as a result of increased recreational pressure. Following discussions with Natural England¹ it was agreed that the access management measures in place are considered to be scalable to deal with the increase in housing numbers proposed. In addition Chichester's commitment to green infrastructure provisions within and adjacent to new homes, is

¹ Email from Natural England dated 01/12/2014

URS Infrastructure & Environment UK Limited
Scott House, Alençon Link
Basingstoke, Hampshire
RG21 7PP
United Kingdom
Tel: +44 (0)1256 310 200
Fax: +44 (0)1256 310 201
www.ursglobal.com

URS Infrastructure & Environment UK Limited
Place of Registration: England & Wales
Registered Number: 880328
Registered Office: Scott House, Alençon Link, Basingstoke, Hampshire, RG21 7PP, United Kingdom

considered sufficient to help to meet the needs of recreation provision for new residents resulting from the additional dwellings.

As such, it is concluded that the additional houses required within the Chichester Local Plan: Key Policies Pre-submission 2014-2029 Proposed Modifications documents will not result in any introduction or exacerbation of likely significant effects upon the European designated sites as a result of the assessment of the Proposed Modifications document in December 2014.

Yours sincerely
for **URS Infrastructure & Environment UK Limited**



Dr James Riley
Principal Biodiversity Specialist

Direct Line: +44 (0)1256 310 367; James.d.riley@urs.com

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect										
Chapter 6: The Economy													
M26	Policy 3 Economy and Employment Provision	Amend the beginning of the 2nd paragraph to read “ Existing undeveloped employment allocations for Business Class (B1-B8) uses are shown on the Policies Map. In addition, To to meet identified requirements”	Minor amendment to text. The amendment has no pathway of impact upon LSE.										
PM06	Policy 3 The Economy and Employment Provision	Amend the final sentence of 2 nd paragraph as follows: “Additional employment sites land will be allocated subject to further investigation of potential sites by the Council in the Site Allocation DPD. ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.										
Chapter 7: Housing and Neighbourhoods													
	Policy 4 – Housing Provision	<p>Amend 1st and 2nd paragraphs of policy: “Provision is made in the Plan to deliver a total of 6,973 7,388 homes over the period 2012-2029. The broad distribution of housing across different parts of the Plan area is indicated in the table below.</p> <table border="1" data-bbox="683 919 1406 1182"> <thead> <tr> <th>Sub-Area</th> <th>Total housing provision 2012-2029</th> </tr> </thead> <tbody> <tr> <td>East-West Corridor</td> <td>5,824 6,156</td> </tr> <tr> <td>Manhood Peninsula</td> <td>843 893</td> </tr> <tr> <td>North of Plan Area</td> <td>339</td> </tr> <tr> <td>Plan Area total</td> <td>6,973 7,388</td> </tr> </tbody> </table> <p>Strategic development sites locations are identified allocated in this Plan to accommodate 3,550 3,250 homes over the Plan period (see Policies 15-18, 20 and 23-24). Additional strategic and parish housing sites will be allocated in subsequent Development Plan Documents and neighbourhood plans in accordance with Policy 5 Policies 5, 20, 23 and 24).”</p>	Sub-Area	Total housing provision 2012-2029	East-West Corridor	5,824 6,156	Manhood Peninsula	843 893	North of Plan Area	339	Plan Area total	6,973 7,388	<p>HRA implications.</p> <p>This provides for an increase in housing allocations in sub-areas 9 East-west Corridor, manhood Peninsula and North of Plan Area) from 6973 to 7388 new dwelling (an increase of 415 new dwellings).</p> <p>Potential impact pathway:</p> <ul style="list-style-type: none"> • Recreational pressure <p>Following discussions with Natural England it was agreed that the access management measures in place are considered to be scalable to deal with the increase in</p>
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			<p>housing numbers proposed, enabling Chichester District Local Plan to meet the needs of recreation provision for new residents resulting from the additional dwellings. As such, It is considered that this amendment to the Local Plan will not result in any likely significant effects and can be screened out.</p>												
	Table 7.2	<p>Amend parts of the table as follows: Table 7.2: Summary of Housing Locations and Sites identified in the Local Plan to 2029</p> <table border="1" data-bbox="674 895 1415 1193"> <thead> <tr> <th>Location</th> <th>Number of homes (approximate)</th> </tr> </thead> <tbody> <tr> <td>East Wittering/Bracklesham</td> <td>100 180</td> </tr> <tr> <td>West of Chichester city</td> <td>1,000 1,250</td> </tr> <tr> <td>Strategic allocations sites total</td> <td>3,550 3,880</td> </tr> <tr> <td>Parish housing sites</td> <td>775 860</td> </tr> <tr> <td>Total sites identified in the Local Plan</td> <td>4,325 4,740</td> </tr> </tbody> </table>	Location	Number of homes (approximate)	East Wittering/Bracklesham	100 180	West of Chichester city	1,000 1,250	Strategic allocations sites total	3,550 3,880	Parish housing sites	775 860	Total sites identified in the Local Plan	4,325 4,740	<p>HRA implications.</p> <p>Although not policy text, this outlines the number of houses required within strategic locations as identified in the above cell.</p> <p>Potential impact pathway:</p> <ul style="list-style-type: none"> Recreational pressure <p>Following discussions with Natural England it was agreed that the access management measures in place are considered to be scalable to deal with the increase in housing numbers proposed, enabling Chichester District Local Plan to meet the needs of recreation provision for new residents resulting from the additional dwellings. As such, It is considered that this amendment to the Local Plan</p>
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			<p>will not result in any likely significant effects and can be screened out.</p>				
	<p>Policy 5 Parish Housing Sites 2012-2029</p>	<p>Amend part of table relating to Chichester city and amend footnote as follows:</p> <table border="1" data-bbox="607 743 1341 820"> <thead> <tr> <th data-bbox="607 743 945 778">Parish</th> <th data-bbox="945 743 1341 778">Indicative Housing Numbers</th> </tr> </thead> <tbody> <tr> <td data-bbox="607 778 945 820">Chichester city^{#(1)}</td> <td data-bbox="945 778 1341 820">150 235</td> </tr> </tbody> </table> <p>1 Identified parish housing sites should be located within the defined settlement boundary. (1) Suitable sites will be allocated through the Site Allocation DPD and may include sites adjoining the Chichester city Settlement Boundary in neighbouring parishes (including sites separated from the settlement boundary by the A27).</p>	Parish	Indicative Housing Numbers	Chichester city ^{#(1)}	150 235	<p>HRA implications.</p> <p>This provides for an increase in housing allocations in Chichester city from 150 to 235 (an increase of 85 dwellings).</p> <p>Potential impact pathway:</p> <ul style="list-style-type: none"> • Recreational pressure <p>Following discussions with Natural England it was agreed that the access management measures in place are considered to be scalable to deal with the increase in housing numbers proposed, enabling Chichester District Local Plan to meet the needs of recreation provision for new residents resulting from the additional dwellings. As such, It is considered that this amendment to the Local Plan will not result in any likely significant effects and can be screened out.</p>
Parish	Indicative Housing Numbers						
Chichester city ^{#(1)}	150 235						
<p>Chapter 8: Transport, Access and Communications</p>							

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
M51	Policy 8 Transport and Accessibility	Add new paragraph after final paragraph to read “ Planned transport measures will involve consultation with all interested parties, including local residents and businesses. ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
Chapter 12: The East-West Corridor			
M61	Policy 10 Chichester City Development Principles	Amend first bullet point to read “... its role as a shopping/ visitor destination and a place to live; ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM33	Policy 10 Chichester City Development Principles	Amend final paragraph of the Policy to read (supercedes M62): If necessary, the Council may prepare a Supplementary Planning Document(s) or Development Plan Document(s) which will set out a coordinated planning framework The Council will prepare Area Action Plan(s) and Development Briefs covering Chichester city centre and other areas of change in the city, which will identify development sites, transport and environmental improvements and define areas within which specific uses are considered appropriate and will be supported.	Minor amendment to text. The amendment has no pathway of impact upon LSE.

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM36	Policy 11 Chichester City Employment Sites	<p>Amend 1st paragraph as follows: Up to 15 hectares of new employment land suitable for Business Class (B1-B8) uses will be brought forward in Chichester city and the surrounding area, of which Around 15-20 hectares of additional employment land will be allocated within or close to Chichester city, including up to 5 hectares suitable for B1 Office uses and 10-15 hectares of land suitable for light industrial/warehousing uses. This will include includes employment land provided allocated as part of the strategic development allocation West of Chichester City (Policy 15).</p>	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM37	Policy 12 Water Resources in the Apuldram Wastewater Catchment Area	<p>Delete and replace policy text as follows (supersedes M86): Within the Apuldram Wastewater Treatment catchment area where there are environmental capacity issues, new development will be required to conform to the following water reduction measures:</p> <ol style="list-style-type: none"> 1. New housing development will be required to meet the Code for Sustainable Homes Level 5 water requirements or equivalent replacement national minimum standards, whichever are higher. Where this is proved to be not viable, the minimum acceptable level will be Level 4; 2. Where possible, the installation of facilities/technologies designed to minimise water usage; 3. No surface water from new development shall be discharged to the public foul or combined sewer systems; and 4. All proposals for residential development of 6 or more dwellings will need to demonstrate through a drainage assessment that they will not result in a significant net increase in flows to the sewer network. <p>Proposals for development in the catchment should be able to demonstrate no adverse impact on the water quality of Chichester Harbour. All proposals for new development in the catchment should conform to the following water management measures:</p> <ol style="list-style-type: none"> 1. All new homes should achieve the higher building regulations standard of 110 litres per person per day including external water use; 2. No surface water from new development shall be discharged to the public foul or combined sewer system; and 3. Where appropriate development should contribute to the delivery of 	This is a positive amendment. There are no likely significant effects

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
		<p>identified actions to deliver infiltration reduction across the catchment.</p> <p>4. Planning permission will be granted for development where the provision of water infrastructure is not considered detrimental to the water environment, including existing abstractions, river flows, water quality, fisheries, amenity and nature conservation.</p>	
M71	Policy 14 Development at Chichester City North	Amend 5 th bullet point to read "...College Lane which provides an appropriate visual and functional arrival point for the main University entrance; "	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M72	Policy 14 Development at Chichester City North	Delete 2 nd paragraph and replace with " In accordance with the guidelines as set out in the 'Chichester City North Development Brief' sites are allocated for the following land uses: "	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM43	Policy 14 Development at Chichester City North	Amend last bullet point to read: Land at Barnfield Drive - Retail and employment uses (Use Classes A1, B1, B2 and B8) subject to a flood risk assessment and a landfill gas risk assessment. Proposed retail uses should meet an identified need or shortfall, complement existing facilities in the city centre and not have have a significant adverse impact on the vitality or viability of the city centre.	Minor amendment to text. The amendment has no pathway of impact upon LSE.

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM44	Policy 14 Development at Chichester City North	Amend final paragraph to read (supercedes M73): If necessary, the Council may prepare a Supplementary Planning Document(s) or Development Plan Document(s) which will set out a coordinated planning framework based on the vision set out in this policy, linking the development of identified sites at Chichester City North with the wider area to the north-east of Chichester city and the rest of the city, including proposed development, green infrastructure, transport and access improvements associated with the land west of the River Lavant that forms part of the Westhampnett/North East Chichester Strategic Development Location (see Policy 17).	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM50	Policy 15	Amend 1 st bullet point: "1,600 homes (of which 4,000 1,250 should be delivered during the Plan period)"	HRA implications This increases the number of houses required during the plan period by 250. Potential impact pathways: <ul style="list-style-type: none"> Recreational pressure Following discussions with Natural England it was agreed that the access management measures in place are considered to be scalable to deal with the increase in housing numbers proposed, enabling Chichester District Local Plan to meet the needs of recreation provision for new residents resulting from the additional dwellings. As such, It is considered that this amendment to the Local Plan will not result in any likely significant effects and can be screened out.

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
M80	Policy 16 Shopwyke Strategic Development Location	Add new paragraph at the end of the policy: Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards.	Positive amendments. No likely significant effects.
PM54	Policy 16 Shopwyke Strategic Development Location	Delete 1 st sentence of 2 nd paragraph: “Development will be masterplanned in accordance with Policy 7.”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM55	Policy 16 Shopwyke Strategic Development Location	After 5 th bullet point in the second section add new bullet point as follows: “Be planned to integrate with other proposed development within the site.”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M87	Policy 18 Tangmere Strategic Development Location	Amend 2 nd set of bullet point number 6 first sentence to read “.... west of Tangmere providing a link with Tangmere Road. Development ...”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M88	Policy 19 Tangmere Strategic Employment Land	Amend policy to read “.... is allocated for B1-B8 and similar employment generating uses in the form of an	Minor amendment to text. The amendment has no pathway of impact upon LSE.
Chapter 13: Manhood Peninsula			

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM67	Policy 24 East Wittering and Bracklesham Strategic Development	Amend 1 st bullet point: “ 400 180 homes”	<p>HRA implications This increases the number of houses required during the plan period by 80. Potential impact pathways:</p> <ul style="list-style-type: none"> • Recreational pressure <p>Following discussions with Natural England it was agreed that the access management measures in place are considered to be scalable to deal with the increase in housing numbers proposed, enabling Chichester District Local Plan to meet the needs of recreation provision for new residents resulting from the additional dwellings. As such, It is considered that this amendment to the Local Plan will not result in any likely significant effects and can be screened out.</p>
Chapter 16: The Economy			
M95	Policy 26 Existing Employment Sites	<p>Amend 2nd paragraph to read:</p> <p>“Existing employment sites that are well located and commercially attractive will be retained for Business (B1-B8) or similar Sui Generis uses to safeguard their contribution to the local economy.</p> <p>Planning permission will be granted for alternative uses on land or floorspace currently or previously in employment generating uses where the following criterion is met:</p>	<p>Minor amendment to text. The amendment has no pathway of impact upon LSE</p>

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
		<p>1. It has been demonstrated (in terms of the evidence requirements accompanying this policy) that the site is no longer required and is unlikely to be re-used or redeveloped for employment uses.”</p>	
M96	Policy 26 Existing Employment Sites	<p>Delete 3rd paragraph and criteria:</p> <p>Planning permission will be granted for alternative uses on land or floorspace currently or previously in Business (B1-B8) or similar Sui Generis uses where the following criterion is met:</p> <p>1. It has been demonstrated (in terms of the evidence requirements accompanying this policy) that the site is no longer required and is unlikely to be re-used or redeveloped for Business (B1-B8) or similar uses.</p>	Minor amendment to text. The amendment has no pathway of impact upon LSE
PM73	Policy 28 Edge & out of centre sites	<p>Amend criterion 1:</p> <p>“The proposal does not have a significant adversely affect impact on the vitality and viability of the central shopping area, either as an individual development or cumulatively with similar existing or proposed developments”</p>	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M102	Policy 29 Settlement Hubs and Village Centres	<p>Amend 1st paragraph to read “...Wittering and Selsey are of an appropriate scale and conform to the shopping function of the centre”</p>	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M104	Policy 30 Built Tourist and Leisure Development	<p>Delete and reword 2nd paragraph to read “Additionally, new tourism buildings including bed and breakfast, self-catering and hotel facilities in the countryside should:</p> <p>In the countryside planning permission will be granted for new tourism buildings including bed and breakfast, self catering and hotel facilities where the above and following criteria have been met:</p>	Minor amendment to text. The amendment has no pathway of impact upon LSE.

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Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM107	Policy 31 Caravan and Camping Sites	Amend 1st paragraph as follows (incorporates M107): “Proposals for caravan, camping and chalet sites and associated facilities and intensification/alterations to existing sites will be granted, unless there is an Article 4 direction, where it can	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M108	Policy 31 Caravan and Camping Sites	Add the following to criterion 1 in first paragraph “... need; and require a rural location; ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M109	Policy 31 Caravan and Camping Sites	Delete and replace penultimate paragraph In order to retain touring caravan sites the change of use to static caravans will be refused, unless it can be demonstrated that there is demand, in the interests of maintaining an adequate supply of touring pitches. In the interests of maintaining an adequate supply of touring caravan pitches proposals for a change of use to static caravan pitches should be accompanied by an assessment of supply and demand.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM81	Policy 32 Horticultural Development Areas	Amend existing text as follows (supercedes M110-117): Horticultural Development 16.33 To ensure that the District’s horticultural industry remains nationally and internationally competitive, it is important that sufficient suitable sites are available. To support this activity, the Council has designated Horticultural Development Areas (HDAs) in the countryside, where glasshouses and related facilities, including packhouses, may be allowed and the impact of their large size and bulk is minimised. 16.34 There are four designated HDAs (please refer to Section 21 Policies Map for further details): Tangmere; Runcton; Sidlesham and Highleigh; and Almodington. 16.35 Large-scale horticultural operators glasshouses at Tangmere and Runcton	Minor amendment to text. The amendment has no pathway of impact upon LSE.

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		<p>are characterised by major expanses of large buildings, which have good access to the main road network. Their businesses supply large supermarkets, garden centres and food chains, and are required to adapt and improve constantly to maintain this market. Consequently, operators seek to increase production volume, with larger premises to achieve the economies of scale required to remain viable. The Council considers that the HDAs should remain available for growing and packing horticultural products and other process directly related to the preparation of vegetable and salad products, such as washing and shredding. Other related processes, including cooking, which do not require a countryside setting, should be located on industrial estates.</p> <p>16.36 Smaller scale horticultural operators glasshouses will be focused within the existing HDAs at Sidlesham and Almodington. This is due to the nature of the land as former Land Settlement Areas formed in the 1930s, which were later designated as Horticultural Development Areas in 1992. Many of the horticultural businesses located in these areas are smaller scale. However the patchwork nature of the landholdings makes land assembly, and therefore expansion, difficult. These areas are further from the A27 than the Tangmere and Runcton HDAs and are less well served by the road network.</p> <p>16.37 It is not expected that large scale operations glasshouse development will occur in the Sidlesham and Almodington HDAs to the same extent as at Tangmere or Runcton. The principle to be followed in the Local Plan is therefore to reinforce the use of the Sidlesham and Almodington areas for smaller scale horticultural / market garden operations rather than larger scale glasshouse development.</p> <p>16.38 It is acknowledged that additional land may be required by the horticultural industry to expand further through the plan period. The preferred approach for horticultural development is for land within existing HDAs to be used first and if not possible, land adjacent to an HDA. When it can be demonstrated that no suitable land within HDAs is available land outside HDAs may be considered.</p> <p>16.39 Policy 32 is divided into two parts, the first part applies to land designated as an HDA where in principle horticultural development is acceptable. The second part of the policy is a criteria based policy which applies to new horticultural development outside HDAs including extensions. The criteria in the first part of the policy apply to applications outside HDAs in addition to those in the second part.</p> <p>16.40 The policy requires applicants to demonstrate why the development cannot be located within an HDA. It is important therefore for the applicant to</p>	

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		<p>provide reasons why the new development cannot be located within an HDA. For example, why the land within HDAs is not available for development. This may need to be substantiated with evidence such as an enquiry log including how it was followed up and why it was unsuccessful i.e. whether the marketing price was realistic or; where proportionate extensions are proposed to an existing horticultural site outside an HDA.</p> <p>16.41 Where it can be demonstrated that development within HDAs is hindered, particularly at Runcton and Tangmere, the Council will where appropriate use its compulsory purchase powers to ensure that the expansion of the horticultural and associated industry is not frustrated.</p> <p>16.42 When considering the proposals for new development outside HDAs including; packhouses and polytunnels, attention will be given to transport and accessibility, visual impact on the landscape and the amenity of local residents. In addition that soil, water, air noise and light pollution levels are minimised and mitigated.</p> <p>16.43 Water resources are managed by the Environment Agency through a Catchment Abstraction Management Strategy (CAMS) approach. This assesses how much water is available in each catchment, how much is allocated to people and how much is needed to sustain the environment. The Arun and Western Streams Abstraction Licensing Strategy (March 2013) https://www.gov.uk/government/publications/arun-and-western-streams-catchment-abstraction-licensing-strategy sets out the current situation within the Chichester District.</p> <p>16.44 Any future applications for abstraction licences will be considered in accordance with this Strategy, taking into account the needs of the environment and existing abstractors are met. Any proposals for horticultural development should consider any potential impact on water resources and consider mitigation measures to reduce its impact and maintain security of supply.</p> <p>Within HDAs Large scale horticultural operations operations glasshouses will continue to be focused within the existing horticultural development areas at Tangmere and Runcton. The Sidlesham and Almodington horticultural development areas will continue to be the focus for smaller scale horticultural businesses businesses glasshouses.</p> <p>Within designated Horticultural Development Areas (HDAs), as shown on the Policies Map, planning permission will be granted for new glasshouse, packhouse and polytunnel development where it can be demonstrated that all the following</p>	

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		<p>criteria (1 – 7) have been met:</p> <ol style="list-style-type: none"> 1. There is no material significant adverse increase in noise levels resulting from machinery usage, vehicle movement, or other activity on the site, which would be likely to unacceptably disturb occupants of nearby noise sensitive properties or be likely to cause unacceptable harm to the enjoyment of the countryside; 2. The proposal does not generate unacceptable levels of soil, water, odour or air pollution and there is no significant adverse impact resulting from artificial lighting on the occupants of nearby noise sensitive properties or on the appearance of the site in the landscape; 3. New planting both on and offsite is sufficient to benefit an improvement to the landscape and increases the potential for screening; 4. Adequate vehicular access arrangements exist or will be provided from the site to the road network to safely accommodate vehicle movements without detriment to highway safety or result in unacceptable harm to residential amenity; 5. The height and bulk of development, either individually or cumulatively, does not damage the character or appearance of the surrounding countryside, and mitigation measures are included to address any detrimental effects i.e. appropriate landscaping and screening e.g. in order to mitigate the height and bulk of new horticultural structures; 6. It can be demonstrated that adequate water resources are available or can be provided and appropriate water efficiency measures are included. 7. Acceptable surface water drainage capacity exists or can be provided as part of the development including sustainable drainage systems or water retention areas. <p>Outside HDAs</p> <p>Planning permission will be granted for new horticultural development proposals including the extension to existing Horticultural Development Areas where the above (1-7) and following criteria (8-11) have been met:</p> <ol style="list-style-type: none"> 8. There is a proven need horticultural justification for the development and it can be demonstrated that the proposal cannot be accommodated within existing HDAs; 9. The land is sufficiently well drained, level and of a quality to be suitable for horticultural development; 10. Necessary essential infrastructure and services related to the development are available or will be provided; and 11. The proposal is not located within open countryside and ensures that long views across substantially open land are retained. 	

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M110	Policy 32 Horticultural Development	Amend criterion 3 “New planting both on and off site is	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M111	Policy 32 Horticultural Development	Delete criterion 4.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M112	Policy 32 Horticultural Development	Delete criterion 5.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M113	Policy 32 Horticultural Development	New criterion 4 to read “ Adequate vehicular access arrangements exist from the site to the road network to safely accommodate vehicle movements without detriment to highway safety and residential amenity; ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M114	Policy 32 Horticultural Development	Delete criterion 3.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M115	Policy 32 Horticultural Development	New criterion 3 to read “ Adequate vehicular access arrangements exist from the site to the road network to safely accommodate vehicle movements without detriment to highway safety and residential amenity; ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M116	Policy 32 Horticultural Development	Delete criterion 4.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M117	Policy 32 Horticultural Development	New criterion 4 to read “ In order to mitigate the height and bulk of new horticultural buildings; appropriate landscaping and screening must be included in such developments; ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
Chapter 17: Housing and Neighbourhoods			
M121	Policy 33 New Residential Development	Amend first paragraph "...residential development, including extension and replacement dwellings "	Minor amendment to text. The amendment has no pathway of impact upon LSE.

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM89	Policy 34 Affordable Housing	<p>Amend policy to read: On all residential development sites. A 30% affordable housing contribution will to be sought as part of residential development where there is a net increase of dwellings. This can be delivered through the following approaches: 1. On all sites of 11 dwellings or more, affordable dwellings should be provided on site. Commuted sums will only be accepted in exceptional circumstances. If it can be demonstrated that affordable housing may not be appropriate, development of affordable dwellings on another site may be considered. If this is not achievable, as a last resort and in exceptional circumstances only, the Council will seek a financial contribution to enable provision of affordable homes elsewhere within the district; 2. On sites of 6 to 10 dwellings in areas designated as rural areas under section 157 (1) of the Housing Act 1985² the Council will seek a financial contribution for the provision of affordable dwellings as a commuted sum unless the developer makes onsite provision.</p> <p>The affordable homes should be provided on site. Commuted sums will only be accepted on sites where there is a net increase of 5 dwellings or less, or in exceptional circumstances. If it can be demonstrated that affordable housing may not be appropriate, development of affordable dwellings on another site may be considered. If this is not achievable, as a last resort and in exceptional circumstances only, the Council will seek a financial contribution to enable provision of affordable homes elsewhere within the district;...</p>	<p>Amendment to policy regarding proportions of affordable housing. No impact pathways present</p>

² Within the whole of the Plan area with the exception of Chichester City and Stockbridge, Southbourne, Selsey and East Wittering.

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM90	Policy 34 Affordable Housing	Amend 4 th bullet point: In exceptional cases, Where a commuted sum is accepted, the payment should reflect the cost of providing the number, type and size of affordable dwellings which would have been provided on-site.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M127	Policy 36 Planning for Gypsies, Travellers and Travelling Showpeople	Amend criterion 1 to read “..... such settlements or else with good access to major roads”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M128	Policy 36 Planning for Gypsies, Travellers and Travelling Showpeople	Amend criterion 4 to read “..... of landscape, historical historic environment or nature conservation protection.”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM93	Policy 36 Planning for Gypsies, Travellers and Travelling Showpeople	Amend 2 nd paragraph to read “...allocated in the Site Allocation DPD Gypsy, Traveller and Travelling Showpeople Site Allocation DPD . The Council’s ...”	Minor amendment to text. The amendment has no pathway of impact upon LSE.

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM94	Policy 36 Planning for Gypsies, Travellers and Travelling Showpeople	Amend 3 rd paragraph to read "...allocation in the Site Allocation DPD Gypsy, Traveller and Travelling Showpeople Site Allocation DPD and for ..."	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM97	Policy 36 Planning for Gypsies, Travellers and Travelling Showpeople	Amend criterion 6 to read "... should not dominate the nearest settled community or Gypsy, Traveller and Travelling Showpeople communities. "	Minor amendment to text. The amendment has no pathway of impact upon LSE.
Chapter 18: Transport, Access and Communications			
M134	Policy 39 Transport, Accessibility and Parking	New paragraph inserted before last paragraph to read " Where development is likely to have an impact on an Air Quality Management Area, an air quality assessment will be required "	Positive amendment. No likely significant effect
Chapter 19: The Environment			
M137	Policy 40 Carbon Reduction Policy	Amend title " Carbon Reduction Policy Sustainable Design and Construction "	Minor amendment to text. The amendment has no pathway of impact upon LSE.

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM100	Policy 40 Carbon Reduction Policy	Replace criterion 2 as follows: “The proposal achieves a minimum of 110 litres per person per day including external water use ; Level 4 from 2013 to 2016; and Level 5 from 2016 in the Code for Sustainable Homes or equivalent national minimum standards, whichever are higher;	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM101	Policy 40 Carbon Reduction Policy	Delete criterion 4.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M141	Policy 42 Flood Risk	Amend the penultimate paragraph to read “..... Water Management Plans, South East River Basin Management Plan and Catchment Flood quality of watercourses have been identified by these plans and strategies and in accordance with the overall objective of the Water Framework Directive ”.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM104	Policy 43 Chichester Harbour Area of Outstanding Natural Beauty (AONB)	Delete criterion 5 and replace as follows: “ Consideration has been given to the requirements of the Chichester Harbour AONB Management Plan. The policy aims of the Chichester Harbour AONB Management Plan. ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M147	Policy 45 Development in the Countryside	Amend the final paragraph to read “ Retail development in the countryside will be strictly controlled. Applications for retail development in the countryside will be considered where it has been demonstrated that the appropriate sequential and/or impact assessments have been undertaken. Local/small scale farm Farm shops will be ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
PM110	Policy 47 Heritage	Delete the existing policy and replace as follows: The Local Planning Authority will continue to conserve and enhance the historic environment through the preparation of Conservation Area appraisals	Amendments to text. No impact pathways present

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
		<p>and management plans and other strategies, and new development which recognises, respects and enhances the local distinctiveness and character of the area, landscape and heritage assets will be supported. Planning permission will be granted where it can be demonstrated that all the following criteria have been met and supporting guidance followed:</p> <ol style="list-style-type: none"> 1. The proposal conserves and enhances the special interest and settings of designated and non-designated heritage assets including: <ul style="list-style-type: none"> - Monuments, sites and areas of archaeological potential or importance; - Listed buildings including buildings or structures forming part of the curtilage of the listed building; - Buildings of local importance, including locally listed and positive buildings; - Historic buildings or structures/features of local distinctiveness and character; - Conservation Areas; and - Historic Parks or Gardens, both registered or of local importance and historic landscapes. 2. Development respects distinctive local character and sensitively contributes to creating places of a high architectural and built quality; 3. Development respects existing designed or natural landscapes; and 4. The individual identity of settlements is maintained, and the integrity of predominantly open and undeveloped character of the area, including the openness of the views in and around Chichester and Pagham Harbours, towards the city, the Cathedral, local landmarks and the South Downs National Park, is not undermined. 	
M156	Policy 48 Natural Environment	Amend 2nd criterion to read “.... and site, and and public amenity and through detailed design:”	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M157	Policy 48 Natural Environment	Amend 4 th criterion to read “....settlements is not diminished undermined. ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
PM112	Policy 48 Natural Environment	<p>Delete criterion 1 and amend as follows: There is no adverse impact on: –The openness of the views in and around the coast, designated environmental areas and the setting of the South Downs National Park; –The tranquil and rural character of the area; and –Development recognises distinctive local landscape character and sensitively contributes to its setting and quality;</p> <p>There is no adverse impact on: - The openness of the views in and around the coast, designated environmental areas and the setting of the South Downs National Park; and - The tranquil and rural character of the area. 2. Development recognises distinctive local landscape character and sensitively contributes to its setting and quality;</p>	Amendment's to text. No impact pathways present
PM113	Policy 48 Natural Environment	Renumber criteria 2. 3. and 4. in light of amendment above.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M158	Policy 49 Biodiversity	Amend 2nd criterion to read “.....biodiversity is avoided and or mitigated”.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M159	Policy 50 Development and Disturbance of Birds in Chichester and Langstone Harbours Special Protection Areas	Amend first sentence to read “..... Langstone Harbours SPA either alone or in-combination with other developments and will need to be”.	Improves text to provide enhanced protection of the SPA preventing likely significant effects either alone or in-combination

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
M160	Policy 50 Development and Disturbance of Birds in Chichester and Langstone Harbours Special Protection Areas	Amend last paragraph to read “..... Zone of Influence might require individual further assessment under the	Minor amendment to text. The amendment has no pathway of impact upon LSE.
M161	Policy 51 Development and Disturbance of Birds in Pagham Harbour Special Protection Area	Amend first sentence to read “..... Pagham Harbour SPA either alone or in-combination with other developments and will need to be	Improves text to provide enhanced protection of the SPA preventing likely significant effects either alone or in-combination
M162	Policy 51 Development and Disturbance of Birds in Pagham Harbour Special Protection Area	Amend last paragraph to read “..... Zone of Influence might require individual further assessment under the	Minor amendment to text. The amendment has no pathway of impact upon LSE.

Table 1. HRA analysis of Further Proposed Modifications documents to policies

Modification Number	Para/ Policy	Modified text (deleted text shown as struck through and additional text shown in bold)	Likely Significant Effect
M166	Policy 52 Green Infrastructure	Amend first paragraph to read “..... green infrastructure, address “any deficits in local green infrastructure provision and protect and”.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
Chapter 20: Health and Well Being			
M169	Policy 54 Open Space, Sport and Recreation	Amend 5 th paragraph to read “New or improved facilities should be provided, to the standard of 3.65ha per 1,000 population (3.55ha in rural areas) , in accordance with the provision detailed standards and methodology set out in the Chichester Open Space Study, Infrastructure Delivery Plan and Community Infrastructure Levy Charging Schedule Planning Obligations Supplementary Planning Document. ”	Minor amendment to text. The amendment has no pathway of impact upon LSE.